

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

James P. Gianakis, Esq. (JG 3930)  
GIANAKIS LAW LLC  
51 JFK Parkway, 1st Floor  
Short Hills, New Jersey 07078  
Tel: (973) 218-2500  
Fax: (973) 218-2401  
Email: jim.gianakis@gmail.com

Attorney for Plaintiffs

BECKY PUND and CHARLES PUND,	)	
	)	UNITED STATES DISTRICT COURT
	)	EASTERN DISTRICT OF NEW YORK
Plaintiffs,	)	
v.	)	Civil Action No. 1:23-cv-01498-HG
	)	
ST. FRANCIS COLLEGE, IRMA	)	<b>DECLARATION OF BECKY PUND</b>
GARCIA, JOHN THURSTON, and	)	
JOHN DOES 1-10, jointly and severally,	)	
	)	
Defendants.	)	
	)	

I, **BECKY PUND**, hereby declare and state as follows:

1. I am a Plaintiff in the above-referenced matter, together with my father, Charles Pund, and I am fully familiar with the facts, circumstances, and proceedings set forth herein. I respectfully submit this Declaration in response to the Court's Order, dated July 28, 2023, that requests information related to my residence since graduating from college.

2. The unlawful actions of Defendants St. Francis College, Irma Garcia, John Thurston, and other agents and/or members of St. Francis College gave me no choice but to leave St. Francis College and resulted in significant damages that continue to this day, including but not limited to losing my scholarship to attend college and to pay for the tuition, room, board, and living expenses associated with going to college.

3. While attending New York University to complete my undergraduate education, I moved home to live and commuted to attend my classes.

4. I have continued to live at home with my family since graduating from New York University and have used my home address in connection with registering to vote, to drive, to apply for work and graduate school, and to file my taxes.

5. Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing statements made in this pleading are true to the best of my knowledge, information, and belief, and that this pleading is made in good faith for the causes set forth herein.

Dated: August 11, 2023

*s / Becky Pund*

BECKY PUND